

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER,
JOHN DOES 1 THROUGH 5,
AND JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

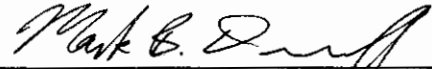
**DEFENDANT ADLER'S MOTION FOR ADDITIONAL TIME
TO DEPOSE PLAINTIFF'S OFFICERS AND OTHER KEY WITNESSES**

Pursuant to Fed. R. Civ. P. 26(b)(2) and 30(d)(2), Defendant Robert Adler ("Adler") moves for leave to ask three hours' worth of questions at depositions of the Plaintiff's officers and other key witnesses, beyond whatever questioning has been or will be conducted by Adler's co-defendants. As set forth more fully in a supporting memorandum, counsel for Plaintiff Direct Report Corporation d/b/a Shareholder.com ("Shareholder") has taken the position that counsel for Adler and co-defendants CCBN.com, Inc. and The Thomson Corporation are limited to a combined total of seven hours' worth of questioning, which they must apportion among themselves in advance of any deposition. The interests of Adler and his co-defendants, however, are not identical, and Shareholder's position effectively deprives Adler of an opportunity to ask the deponents questions that relate to Shareholder's allegations against him personally.

WHEREFORE, this Court should grant Adler leave to ask three hours' worth of questions to any Shareholder deponent, beyond whatever questioning has been conducted by lawyers for his co-defendants.

ROBERT ADLER,

By his attorneys,

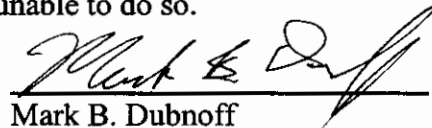


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September 16, 2005

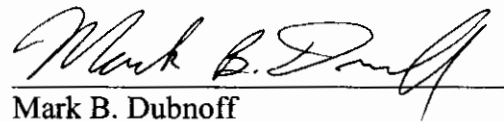
LOCAL RULE 7.1(a)(2) AND 37.1(A) CERTIFICATION

The undersigned hereby certifies, pursuant to Local Rules 7.1(a)(2) and 37.1(A), that counsel for Adler has communicated with counsel for the Plaintiff and attempted in good faith to resolve the issues presented in this motion but was unable to do so.


Mark B. Dubnoff

CERTIFICATE OF SERVICE

I certify that on this 16th day of September, 2005, I caused a copy of the foregoing to be delivered to Thane Scott, Palmer & Dodge LLP, 111 Huntington Avenue at Prudential Center, Boston, MA 02199-7613, and Anthony S. Fiotto, Goodwin Procter LLP, Exchange Place, Boston, MA 02109 by hand.


Mark B. Dubnoff